

I, Joseph Hamm, declare that the following statements are true to the best of my knowledge:

1. I am a plaintiff in the above-referenced lawsuit.
2. I live in Lycoming County, Pennsylvania.
3. I am a Pennsylvania State Representative.
4. I was elected as a State Representative of the 84th House District in 2020 and 2022.
5. The 84th House District covers most of Lycoming County and all of Sullivan County.
6. As State Representative, I serve in the Pennsylvania House of Representatives.
7. The Constitution of the United States of America and the Constitution of the Commonwealth of Pennsylvania divides government into three (3) branches: Legislative, Executive and Judicial.
8. The Pennsylvania House of Representatives is a part of the Legislative Branch of Government and as such is tasked in part with making all laws.
9. The Executive Branch is tasked Constitutionally with the implementation of laws passed by the Legislative Branch. The Executive Branch does not make law according to the Constitution.
10. As State Representative, I am tasked with taking the voice of the people I represent to the State Capitol and fighting for their principles and values.
11. In my Legislative capacity, I am the voice of the people I represent and as such pass laws that I believe will provide my constituents the best opportunities and quality of life in this Commonwealth.
12. When an Executive exceeds his authority and begins trying to make law, the Executive violates our Constitution and takes the voice of the Legislative Branch away effectively leaving the people of Pennsylvania with no voice.

13. The people of the 84th House District in Lycoming and Sullivan Counties have been left without a voice as the Executive branch has far exceeded its constitutional authority and is usurping Legislative authority.
14. In September 2023, Governor Shapiro through a press release, announced his unilateral action to change voter registration laws by enacting Automatic Voter Registration.
15. I was not given the opportunity to vote for this change to Pennsylvania law.
16. Existing Pennsylvania law requires an Opt-In option for Voter Registration applications. Governor Shapiro's Automatic Voter Registration requires an individual to Opt-Out of Automatic Voter Registration. Governor Shapiro's edict is in direct violation of current Pennsylvania law which requires an application process to register. Individuals that would like to register must "apply to" register to vote.
17. In 2022, I voted in favor of Act 88 to keep third party entities from influencing Pennsylvania elections. President Biden's Executive Order 14019 requires federal agencies located within the Commonwealth of Pennsylvania to partner with third party entities for voter registration and get out the vote activities. This is in direct violation of current Pennsylvania law.
18. Through his Executive Order 14019, President Biden is distorting the legislative process and preventing Act 88 from ever taking its intended legal effect. As a lawmaker, I have no recourse through the legislative process to remedy this abuse.
19. As a lawmaker, I have reviewed the statute that requires the board of elections to verify the identity of individuals who register to vote. The Directive issued by the Department of State which instructs Pennsylvania counties to register applicants even if an applicant provides invalid identification violates Pennsylvania law. When election officials direct county election offices to disregard the law, as established by the lawmakers, they distort the legislative process. I have been deprived of an opportunity to vote for this change to Pennsylvania law. I have been disenfranchised as a legislator.

20. If the extraordinary overreach of the Executive is allowed it would upend the meticulous balance of power between the 3 branches of government.
21. If the Executive's extraordinary overreach is not stopped by the Court, the Legislative Branch of government would be ineffective and meaningless as the Executive would just do whatever he wanted through executive order, edict, and press release.
22. As State Representative, I would be left with no legislative authority if the Executive can usurp our authority.
23. I respectfully ask the Court to bring the meticulous balance of power back between the three (3) branches of government by striking down the overreach of the Executive and requiring that if Voter Registration laws are to change it must be through Legislative action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 2/15/2024

/s/Joseph Hamm